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7

8 BEFORE THE FAIR POLITICAL PRACTICES COMMISSION

9 STATE OF CALIFORNIA
10

11 In the Matter of) FPPC No.: 03/524
12)
13 RICHARD GRIFFIN, COMMITTEE TO RE-) STIPULATION, DECISION and
14 ELECT RICHARD GRIFFIN, AND BETTYE) ORDER
15 C. GRIFFIN,)
16 Respondents.)
17)
18)

19 Complainant Mark Krausse, Executive Director of the Fair Political Practices Commission, and
20 Respondents Richard Griffin, Committee to Re-Elect Richard Griffin, and Bettye C. Griffin hereby
21 agree that this stipulation will be submitted for consideration by the Fair Political Practices Commission
22 at its next regularly scheduled meeting.

23 The parties agree to enter into this stipulation to resolve all factual and legal issues raised in this
24 matter, and to reach a final disposition without the necessity of holding an administrative hearing to
25 determine the liability of Respondents.

26 Respondents understand and hereby knowingly and voluntarily waive any and all procedural
27 rights set forth in sections 83115.5, 11503 and 11523 of the Government Code, and in sections 18361.1
28 through 18361.9 of title 2 of the California Code of Regulations. This includes, but is not limited to, the

1 right to personally appear at any administrative hearing held in this matter, to be represented by an
2 attorney at Respondents' own expense, to confront and cross-examine all witnesses testifying at the
3 hearing, to subpoena witnesses to testify at the hearing, and to have an impartial administrative law
4 judge preside over the hearing as a hearing officer, and to have the matter judicially reviewed.

5 Respondents further stipulate and agree that Respondents Richard Griffin, Committee to Re-
6 Elect Richard Griffin, and Bettye C. Griffin violated the Political Reform Act by failing to maintain
7 campaign records in violation of section 84104 of the Government Code (3 counts); failing to properly
8 itemize contributions of one hundred dollars (\$100) or more in violation of section 84211, subdivision
9 (f) of the Government Code (3 counts); failing to properly itemize expenditures of one hundred dollars
10 (\$100) or more in violation of section 84211, subdivision (k) of the Government Code (5 counts); failing
11 to file late contribution reports in violation of section 84203 of the Government Code (1 count);
12 reimbursing Respondent Richard Griffin for an expenditure of his personal funds in violation of section
13 89511.5, subdivisions (b) and (d) of the Government Code (1 count); and making cash expenditures of
14 one hundred dollars (\$100) or more, in violation of section 84300, subdivision (b) of the Government
15 Code (1 count), as described in Exhibit 1. Exhibit 1 is attached hereto and incorporated by reference, as
16 though fully set forth herein. Exhibit 1 is a true and accurate summary of the facts in this matter.

17 Respondents agree to the issuance of the decision and order, which is attached hereto.
18 Respondents also agree to the Commission imposing upon them an administrative penalty in the amount
19 of Twenty-Four Thousand Dollars (\$24,000). A cashier's check from Respondents in said amount,
20 made payable to the "General Fund of the State of California," is submitted with this stipulation as full
21 payment of the administrative penalty, and shall be held by the State of California until the Commission
22 issues its decision and order regarding this matter. The parties agree that in the event the Commission
23 refuses to accept this stipulation, it shall become null and void, and within fifteen (15) business days
24 after the Commission meeting at which the stipulation is rejected, all payments tendered by Respondents
25 in connection with this stipulation shall be reimbursed to Respondents. Respondents further stipulate
26 and agree that in the event the Commission rejects the stipulation, and a full evidentiary hearing before
27 the Commission becomes necessary, neither any member of the Commission, nor the Executive
28 Director, shall be disqualified because of prior consideration of this stipulation.

1
2 Dated: _____

3 Mark Krausse
4 Executive Director
5 Fair Political Practices Commission

6 Dated: _____

7 Richard Griffin, Respondent

8 Dated: _____

9 Bettye C. Griffin, individually and on behalf of Committee
10 to Re-Elect Richard Griffin, Respondents

11 **DECISION AND ORDER**

12 The foregoing stipulation of the parties “In the Matter of Richard Griffin, Committee to Re-Elect
13 Richard Griffin, and Bettye C. Griffin, FPPC No. 03/524,” including all attached exhibits, is hereby
14 accepted as the final decision and order of the Fair Political Practices Commission, effective upon
15 execution below by the Chairman.

16
17 IT IS SO ORDERED.

18 Dated: _____

19 Liane M. Randolph, Chairman
20 Fair Political Practices Commission